

From: "[REDACTED]" <[REDACTED]>
To: [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>
Cc: "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED]" <[REDACTED]>

Subject: RE: Questions re Maxwell

Date: Mon, 23 Nov 2020 15:50:24 +0000

Attachments: 2020-11-23_GM_letter_update_re_MDC_conditions_v2.docx

Good morning,

Attached is the final version of the letter to Judge Nathan [REDACTED] This is the final version that we plan to file. Please let me know ASAP if anything in this letter is inaccurate.

Thanks very much,
[REDACTED]

[REDACTED]
Assistant United States Attorney
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007
[REDACTED]
[REDACTED]

From: [REDACTED] (USANYS)
Sent: Sunday, November 22, 2020 6:34 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Questions re Maxwell

[REDACTED]
Attached please find a draft update letter to Judge Nathan. Please let me know by the end of the day tomorrow (11/23) if anything in this letter is inaccurate. [REDACTED]
[REDACTED]

Also, if you could please get me responses to the two questions in my below email tomorrow, I'd be very grateful.

Happy to have a call if that would be useful.

Thanks very much,
[REDACTED]

[REDACTED]
Assistant United States Attorney
Southern District of New York
1 St. Andrew's Plaza

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New York, NY 10007

From: [REDACTED]
Sent: Friday, November 20, 2020 2:34 PM
To: Nicole McFarland <[REDACTED]>; Sophia Papapetru <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Questions re Maxwell

Hi [REDACTED],

I just got a call from [REDACTED] and we discussed a number of issues regarding Maxwell. The two issues I wanted to follow up with you about are below:

- Maxwell is reporting that a staff member named [REDACTED] or [REDACTED] was part of the group that included a COVID positive individual but [REDACTED] is still working at the MDC. Would you please check on that for me?
- Maxwell reported that a staff member entered her cell while she was inside it and took photographs of her cell today. Anything you can share with me about the purpose of that?

More generally [REDACTED] indicated that she believes Maxwell's mental health is deteriorating significantly because of the constant surveillance she is experiencing. She reports being awoken in the night by a light shining into her eyes multiple times a night, being searched more frequently than other inmates, and having a camera constantly pointed at her in a way that other inmates do not experience. Our office of course defers to BOP on decisions regarding what is necessary for safety and security, but I wanted to pass along the concern.

Thanks,

[REDACTED]
[REDACTED]
Assistant United States Attorney
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007
[REDACTED]
[REDACTED]